

# Fact Sheet



## For Draft/Proposed Significant Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on July 24, 2012.

Permit Number: **R30-10900013-2012**  
Application Received: **May 31, 2013**  
Plant Identification Number: **03-54-109-00013**  
Permittee: **Kepler Processing Company, LLC**  
Facility Name: **Pocahontas No. 51 Preparation Plant**  
Mailing Address: **P.O. Box 1392, Pineville, WV 24874**

Permit Action Number: *SM02*      Revised: *Draft/Proposed*

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Physical Location:	Pineville, Wyoming County, West Virginia
UTM Coordinates:	449.67 km Easting • 4158.67 km Northing • Zone 17
Directions:	From Pineville, WV, travel west on WV State Route 97 approximately three (3) miles. Facility is adjacent to Route 97.

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### Facility Description

The Pocahontas No. 51 Preparation Plant is a coal preparation plant with thermal dryer. It operates under SIC Code 1221 and has the ability to screen, break/size, wash, thermally dry, store, and load out/in coal. The maximum capacity of the preparation plant is 1,000 tons per hour of raw coal feed.

The proposed Title V Significant Modification (SM02) incorporates changes associated with the Permit R13-2104G after-the-fact Class I administrative update.

## Emissions Summary

The change in emissions as a result of this modification is as follows:

Plantwide Emissions Summary [Tons per Year]	
Criteria Pollutants	Potential Emissions
PM <sub>2.5</sub>	0.32 Decrease
PM <sub>10</sub>	2.12 Decrease
Total PM	8.68 Decrease

## Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Kepler Processing Company, LLC is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

## Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR5	Operation of Coal Preparation Plants
	45CSR13	Permits for Construction, Modification, Relocation and Operation of Stationary Sources
	45CSR16	Standards of Performance for New Stationary Sources Pursuant to 40 CFR Part 60
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 60 Subpart Y	Standards of Performance for Coal Preparation Plants
State Only:	NA	

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

## Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-2104G	March 17, 2014	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under

the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

### **Determinations and Justifications**

This permit modification incorporates the modified R13-2104G permit to replace the existing 800 TPH raw coal vibrating screen *SC1* with a 1,000 TPH vibrating screen; increase maximum hourly raw coal throughput for truck dump hoppers *B3* and *B4*, belt conveyors *C-1*, *C-4* and *C-5* and raw coal silo *B6*; increase the maximum hourly and annual refuse throughput rates for belt conveyors *C-2*, *C-10*, *C-15*, *C-17*, *C-18*, *C-22*, and *C-23*, surge bin *B7*, open storage pile *OS3*, and truck loadout bins *B2* and *B5*.

- 1) The "or Modified" was added to the "Year Installed" column heading in the "Emission Units" table. The table was updated for "Year Installed or Modified" dates, equipment unit descriptions and design capacities associated with the R13-2104G administrative update.
- 2) The "throughput" table in Condition 4.1.1. has been updated to include the revised throughputs associated with the R13-2104G administrative update. Also the associated transfer points for "*C-17*" have been revised to match R13-2104G.
- 3) Condition 4.3.8 - has been added as part of the R13-2104G administrative update for the truck unloading operation to hoppers "*B3*" and "*B4*". The subsequent conditions have been renumbered.
- 4) Condition 4.1.3. – the storage bins and hoppers *B2*, *B3*, *B4*, *B5*, & *B7* and conveyors *C-1*, *C-10* & *C-15* have been removed from Condition 4.1.3. and added to condition 4.1.4.
- 5) Condition 4.1.4. – In addition to the equipment mentioned in Item 4 above, screen *SC1*, Silo *B6*, and conveyors *C-2*, *C-4*, *C-5*, *C-17* & *C-18* were added to this condition.
- 6) Condition 4.1.5. – Silo *B6*, Screen *SC1* and Conveyors *C-2*, *C-4*, *C-5*, *C-17* & *C-18* were added to this condition.
- 7) Condition 4.4.5. – Screen *SC1*, Storage bins and hoppers *B2*, *B3*, *B4*, *B5*, *B6*, *B7*, and Conveyors *C-1*, *C-2*, *C-4*, *C-5*, *C-10*, *C-15*, *C-17*, *C-18* were added to this condition.

### **Non-Applicability Determinations**

The following requirements have been determined not to be applicable to the subject facility due to the following:

40 CFR Part 64 None of the equipment associated with this modification use an add-on control device to achieve compliance with any emission limitation or standard. Therefore CAM is not applicable

Greenhouse Gas (GHG) Permitting – The R13-2104G modification has not triggered a PSD permit. Therefore, there are no applicable GHG requirements

### **Request for Variances or Alternatives**

None.

### **Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

**Comment Period**

Beginning Date: June 4, 2014  
Ending Date: July 7, 2014

**Point of Contact**

All written comments should be addressed to the following individual and office:

Frederick Tipane  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1215 • Fax: 304/926-0478  
frederick.tipane@wv.gov

**Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

**Response to Comments (Statement of Basis)**

Not applicable.